#### **ELLIS: LAWHORNE**

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April 17, 2006

#### FILED ELECTRONICALLY AND VIA FIRST-CLASS MAIL SERVICE

F. David Butler, Esquire
SC Public Service Commission
P.O. Drawer 11649
Columbia, SC 29211

RE:

Application of IPC Network Services, Inc. for a Certificate of Public Convenience and Necessity to Provide Resold Local Exchange and Resold Long Distance Telecommunications Services and for Flexible Regulation of Its Local Exchange Services and Alternative Regulation of its

Long Distance Offerings

Docket No. 2006-55-C, Our File No. 1158-11360

Dear Mr. Butler:

Enclosed for filing is the original and one (1) copy of the Motion to Present Witness Via Telephone or in the Alternative, Video Conference in the above-referenced docket. By copy of this letter, I am serving all parties of record in this proceeding and enclose my Certificate of Service to that effect.

Please acknowledge your receipt of this document by file-stamping the copy of this letter enclosed, and returning via the United States Postal Service in the envelope provided.

If you have any questions or need additional information, please do not hesitate to contact me.

With kind regards, I am

Yours truly,

John J. Pringle, Jr.

cc: Thomas Lynch, Esquire (via first-class mail service)

Shannon Hudson, Esquire (via first-class mail service)

Enclosures

THIS DOCUMENT IS AN EXACT DUPLICATE OF THE E-FILED COPY SUBMITTED TO THE COMMISSION IN ACCORDANCE WITH ITS ELECTRONIC FILING INSTRUCTIONS

## BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA DOCKET NO. 2006-55-C

In the Matter of	)
The Application of IDC Naturals Convices Incompareted for a	)
The Application of IPC Network Services, Incorporated for a	)
Certificate of Convenience and Necessity to Provide Local	)
Exchange and Resold Long Distance Telecommunications	)
Services, and for Flexible Regulation of its Local Exchange	)
Services and Alternative Regulation of Its Long Distance	
Offerings	

### MOTION TO PRESENT WITNESS VIA TELEPHONE OR IN THE ALTERNATIVE VIA VIDEO CONFERENCE

Applicant IPC Network Services, Incorporated respectfully asks the Commission for permission to allow its witness to present her testimony during the hearing scheduled for May 8, 2006 via the telephone, or in the alternative, via videoconference. In support of its motion, Applicant respectfully states the following:

- 1. Applicant is a reseller of point-to-point private line services. Its office is located in New York, New York.
- Applicant filed the Direct Testimony of Marianne Leitch on April 10,
   2006, in support of its application, as required by the Commission rules.
- 3. It would be a hardship, however, for Applicant and for Ms.Leitch to have Ms. Leitch travel to South Carolina to attend the hearing in person. Ms. Leitch lives in New York. She is a key employee of the Applicant and is responsible for overseeing much of its day-to-day operations.
- 4. Neither the Commission nor the general public will be harmed if
  Applicant is allowed to present its witness by telephone or via video. In fact, the
  Commission allows certain witnesses to be deposed via telephone and their depositions

made part of the record at the hearing without actual witness appearance in the hearing room.

5. Finally, if after hearing by telephone or video, the Commission desires to have the Applicant's witness appear in person, the hearing could thereafter be continued to allow for such a personal appearance.

Wherefore, for the stated reasons, Applicant respectfully asks that the Commission allow it to present its witness via telephone or via video during the May 8, 2006 hearing.

John J. Pringle, Jr., Esquire 1501 Main Street, 5<sup>th</sup> Floor

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Attorney for IPC Network Services,

Incorporated

Columbia, South Carolina April 17, 2006

# BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA DOCKET NO. 2006-55-C

In the Matter of	)	
The Application of IPC Network Services, Incorporated for a Certificate of Convenience and Necessity to Provide Local Exchange and Resold Long Distance Telecommunications Services, and for Flexible Regulation of its Local Exchange Services and Alternative Regulation of Its Long Distance Offerings	,	CERTIFICATE OF SERVICE
Onemigs		

This is to certify that I have caused to be served this day, one (1) copy of the Motion to Present Witness Via Telephone or in the Alternative, by Video Conference by placing a copy of same in the care and custody of the United States Postal Service (unless otherwise specified), with proper first-class postage affixed hereto and addressed as follows:

Shannon Hudson, Esquire Office of Regulatory Staff Legal Department PO Box 11263 Columbia SC 29211

Carol Roof

April 17, 2006 Columbia, South Carolina